Exhibit B

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

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Edwards Angell Palmer & Dodge LLP

RODNEY BARBER :
:
vs. : C.A. NO.: 05-390-ML
:
VERIZON NEW ENGLAND, INC :

DEFENDANT'S FIRST SET OF INTERROGATORIES TO PLAINTIFF

Pursuant to Federal Rules of Civil. Procedure 33, Defendant, Verizon New England Inc. ("Verizon"), propounds the following Interrogatories to Plaintiff Rodney Barber ("Barber" or "Plaintiff").

1. Please identify the individual responding to these Interrogatories by proving that individual's full name, address, date of birth, present employment and job title.

Response: Rodeny Barber, 305 Greenwich Avenue, Warwick RI 02886, May 15, 1955, Verizon, Equipment Installation Technician.

2. Please identify any individual who assisted in the preparation of your response to these Interrogatories by providing each individuals full name, address, date of birth, present employment and job title.

Response: None

3. Identify each person who has personal knowledge of facts concerning the claims you are asserting against Defendant in the above-captioned, and as to each such person, state the subject matter of the knowledge that each person possesses.

Response: Robert Powers, Union Representative, knew what happened at work, Lorna Deplitch is the person who fired me, Joseph Conway is Deplitch's Supervisor, and David Paolino was present at the time I was fired.

4. Identify each and every legal action, including civil lawsuits, discrimination charges and other similar matters, that you have threatened to file, filed, or that have been filed on your behalf. For each such action set forth the court or agency involved, the dates such litigation commenced, the full name of all the parties involved, the subject matter settled and the amount of said settlement.

Response: None

5. Please identify and describe any and all documentation referred to or relied upon to answer these Interrogatories.

Response: None

6. State whether you intend to rely on any alleged admission made by Defendant and/or it's agents in this action. If so, identify the person making the admission, the person(s) to whom the admission was made, any document or oral communication relating to such admission in any way, and substance of each such admission.

Response: None

7. If you have been convicted of a crime or have any criminal charges pending against you, for each such conviction or charge, please state the dates of arrest , arraignment, indictment, conviction and incarceration ;the court that convicted you; he charges on which you were convicted; the docket number of all the proceedings.

Response: None

8. If you have obtained any signed or unsigned statements, whether recorded or written of any witnesses or other persons who have knowledge of any facts in this action, please identify the name and address of each such person, the date the statement was made, and in whose custody this statement is now located.

Response: None

9. Identify, by source and amount, all wages, compensation, or other income you received from January 2004 until your reinstatement and employment with Verizon. This includes but is not limited to, disability payments and unemployment compensation.

Response: Unemployment 480.00 per week for 12 weeks.

10. Itemize all elements of damages you claim against the Defendant, and for each element, state the amount of damages you are claiming; state the manner in which you calculated the damages; state the basis for your claim that you are entitled to that element of damages.

Response: Discussing this amount with my attorney, will supplement this answer once it has been determined.

11. Please describe in detail all efforts made to find employment following your

termination from Verizon.

Response: Looked through unemployment online made phone calls etc.

12. Please specifically describe your alleged disability and state:
    (a) The date you were disabled;
    (b) Specifically, how your disability affected your ability to perform your job at Verizon;
    (c) What accommodation would be needed for you to perform your job.

Response: (a) Hepatitis C approximately 1994
(b) it affected my sleep wake cycle and causes fatigue
(c) minumal shift changes

13. Please provide the following information regarding your medical history:
    (a) The name and address or each doctor, psychiatrist or psychological seen for any reason
    (b) The date of each visit
    (c) The Reason for each visit
    (d) The dates of any confinement in a medical institution;
    (e) The name of each medical institution
    (f) The cause of confinement
    (g) A Description of your physical and mental condition just before each occurrence.

Response: See Request for Production Exhibit C.

14. Please describe all facts which support the contention made in paragraph 23 of your complaint that the actions of Verizon have denied you the ability to make and enforce contracts as a result of you alleged disability.

Response: Other co workers in the same situation were only suspended not terminated from their position but I was. In addition, termination was to great a punishment for my alleged actions.

15. Please describe all facts which support your claim that Verizon discriminated against you on the basis of you alleged disability.

Response: See my response for number 14.

16. Please describe each act or omission by Verizon which you allege constitute illegal discrimination. For each act listed, describe:
    (a) When such act or omission occurred;
    (b) Where such act or omission occurred;
    (c) The person or persons responsible for each such act or omission; and
    (d) Any and all witnesses to such act or omission.

Response: (a) Suspended and then terminated due to sick leave,(b) January 17, 2004, Washington Street Providence RI ,(c) Lorna Deplitch and Joseph Conway (d) see answer to Interrogatory No. 3.

RODNEY BARBER

STATE OF RHODE ISLAND
COUNTY OF PROVIDENCE

Subscribed and sworn to me this 25th day of April, 2006.

Comm expires 12/24/08

CERTIFICATION

I hereby certify that on the 25 day of April, 2006 I mailed postage prepaid a true copy of the within to Attorney John D. Doran, Edwards & Angell, LLP, 2800 Financial Plaza, Providence RI 02903, and Attorney Timothy P. Van Dyck, Edwards & Angell, LLP , 101 Federal Street, Boston, MA 02110.